

MICHAEL E. KOZLIK  
direct dial: 860-509-6570  
mkozlik@brownrudnick.com

CityPlace I  
185 Asylum  
Street  
Hartford  
Connecticut  
06103  
tel 860.509.6500  
fax 860.509.6501

September 21, 2007

**VIA EMAIL AND HAND DELIVERY**

Daniel F. Caruso  
Chairman  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06051

**RE: Petition No. 815 – Iroquois Gas Transmission System, L.P. Petition for a Declaratory Ruling that the Connecticut Siting Council has an Advisory Role to the Federal Energy Regulatory Commission Regarding Iroquois's 08/09 Expansion Project in Brookfield, Newtown, and Milford, Connecticut**

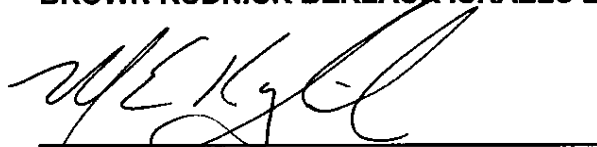
Dear Chairman Caruso:

At the Connecticut Siting Council's September 12, 2007 hearing on Petition No. 815, Iroquois Gas Transmission System, L.P. ("Iroquois") was requested to file six (6) late-filed exhibits. On behalf of Iroquois, enclosed are an original and twenty (20) copies of Iroquois' Late-Filed Exhibit Nos. 1, 2, 3, 4, and 6. Iroquois anticipates filing Late-Filed Exhibit No. 5 by the end of next week.

Please contact me with any questions concerning this filing.

Very truly yours,

**BROWN RUDNICK BERLACK ISRAELS LLP**

  
Michael E. Kozlik

**Enclosures**

cc: Francis J. Collins, Esq.  
Thomas W. Beecher, Esq.  
John Haines, Esq.  
Jeffrey A. Bruner, Esq.  
Paul W. Diehl, Esq.

# 40244054 v1 - 070787/0005

**LATE-FILED EXHIBIT NO. 1**

**SCR Analysis for MarketAccess Project**

At the September 12 hearing, Attorney Beecher asked whether Iroquois had evaluated the possibility of using selective catalytic reduction ("SCR") and an oxidation catalyst ("OC") to reduce emissions from its MarketAccess Project, and whether, as recommended by the Siting Council in Petition No. 755A, that evaluation was provided to the Connecticut Department of Environmental Protection ("DEP").

Iroquois did analyze the possibility of using SCR and OC for its MarketAccess Project. Iroquois's SCR/OC analysis was filed with the Siting Council in Petition No. 755A as Iroquois's response to Q-CSC-006.

Iroquois filed a response with the Federal Energy Regulatory Commission ("FERC") to comments of federal and state agencies, including the Siting Council. Iroquois's response was as follows:

As part of Iroquois' air permit application to the Connecticut Department of Environmental Protection DEP, Iroquois was required to demonstrate to the DEP's satisfaction that the proposed dry low NO<sub>x</sub> turbine combustor satisfies applicable Best Available Control Technology (BACT) requirements. Iroquois addressed the DEP's specific regulatory requirements to demonstrate that dry low NO<sub>x</sub> combustor technology is the most feasible choice among available emission control alternatives, including selective catalytic reduction (SCR), oxidation catalysts and other possibilities. Iroquois' application demonstrates that its proposed low NO<sub>x</sub> emission controls not only satisfy BACT requirements, but that the proposed low BACT controls are more stringent than all other BACT precedents for similar sources nationwide over the past five years. The DEP has the authority to regulate and to approve emissions controls for the proposed Brookfield turbine, and does not require the submittal of any supplemental information pertaining to SCR or oxidation catalysts. Additionally, Iroquois' response to the CSC's data requests in the CSC process, and especially the response to CSC-006, provided a detailed explanation of why SCR and oxidation catalysts are not required to satisfy BACT requirements.

FERC did not accept the Siting Council's recommendation. Additionally, Iroquois had already received a tentative determination (i.e., a draft air permit approval) from the DEP prior to the Siting Council's recommendation to the FERC so that the filing of additional information with DEP would not have been timely. For these reasons, Iroquois did not file additional analysis with the DEP regarding SCR or an OC.

**LATE-FILED EXHIBIT NOS. 2 AND 3**

**Air Quality Impacts at Whisconier Middle School and Effect of Increased Stack Heights**

At the September 12 hearing, the Siting Council requested information on air quality impacts at the Whisconier Middle School and on the effect of increased stack height on those impacts. The attached table provides information addressing both requests.

For each pollutant and averaging period, the National Ambient Air Quality Standard (NAAQS), Prevention of Significant Deterioration (PSD) increment and Significant Impact Level (SIL) are compared with predicted ground-level air quality concentrations at the Whisconier Middle School. Predicted concentrations are shown for various stack heights ranging from 50 feet to 75 feet. Since the proposed 08/09 Expansion Project turbine stack height is 50 feet, concentrations shown in the "50 ft" column represent proposed impacts at the Middle School. The columns to the right of the "50 ft" column represent predicted impacts with increasing stack height increments of 5 feet. By reading the values from left to right in each row, one can see the effect that increasing stack height would have on predicted air quality impacts. As required by the CT DEP, two different air quality models were actually used to predict potential impacts (i.e.: AERMOD and PTMTPA). Only the model resulting in the greatest predicted impacts is represented in the table below (i.e., PTMTPA).

It is important to note that all proposed impacts at the Middle School (i.e., 50 foot stack height) are less than SILs, and therefore are very small fractions of the corresponding PSD increments and NAAQS concentrations. The mathematical algorithms that comprise the air emissions dispersion model do not predict significantly different impacts for every stack height increment. In some cases, increasing the stack height has no effect on predicted concentrations.

PM10 represents particulate matter smaller than or equal to 10 microns in aerodynamic diameter. PM2.5 represents diameters of 2.5 microns or smaller. "Inhalable" (PM10) and "fine" (PM2.5) particulate matter predictions are identical since all natural gas combustion particulate matter emissions are considered to be smaller than PM2.5.

Increasing the proposed stack height to greater than 50 feet would not have any significant benefits for human health or the environment in the area of the Middle School because:

- The U.S. EPA has determined that NAAQS levels are adequate to protect human health and the environment, including sensitive populations such as the elderly and young,
- SIL concentrations are a minor fraction of NAAQS, and
- Predicted air quality impacts at the Whisconier Middle School with the proposed 50 foot stack height would be less than SILs.

**PTMTPA Summary**

Pollutant	Averaging Time	NAAQS ( $\mu\text{g}/\text{m}^3$ )	PSD Increment ( $\mu\text{g}/\text{m}^3$ )	SIL ( $\mu\text{g}/\text{m}^3$ )	Predicted Concentrations at Whisconier Middle School - $\mu\text{g}/\text{m}^3$					
					Stack Height					
					50 ft	55 ft	60 ft	65 ft	70 ft	75 ft
SO <sub>2</sub>	3 hr	1300	512	25	0.266	0.248	0.231	0.214	0.197	0.180
	24 hr	365	91	5	0.034	0.034	0.026	0.026	0.026	0.026
	Annual	80	20	1	0.005	0.005	0.005	0.004	0.004	0.004
PM <sub>10</sub>	24 hr	150	30	5	1.855	1.855	1.391	1.391	1.391	1.391
	Annual	50	17	1	0.259	0.259	0.259	0.194	0.194	0.194
PM <sub>2.5</sub>	24 hr	35	-	2	1.855	1.855	1.391	1.391	1.391	1.391
	Annual	15	-	0.3	0.259	0.259	0.259	0.194	0.194	0.194
NO <sub>2</sub> <sup>(1)</sup>	Annual	100	25	1	0.277	0.277	0.277	0.207	0.207	0.207
CO	1 hr	40,000	-	2,000	23.175	21.680	20.185	18.690	17.194	15.699
	8 hr	10,000	-	500	23.175	21.680	20.185	18.690	17.194	15.699

<sup>(1)</sup> Annual modeled concentration reflects a 75% conversion of NOx to NO<sub>2</sub> per U.S. EPA.

**Iroquois Gas Transmission System L.P.**  
**Petition No. 815**  
**Responsible Witness: Brian Wolf**

**Connecticut Siting Council**  
**Late-Filed Exhibits**  
**September 12, 2007**

**LATE-FILED EXHIBIT NO. 4**

**Consultation with the Connecticut Department of Emergency Management  
and Homeland Security**

At the hearing of September 12, Iroquois was asked to expand on its response to interrogatory Q-CSC-6 to address whether the Connecticut Department of Emergency Management and Homeland Security had been involved in or invited to Iroquois' emergency responder meetings.

Iroquois has invited the Connecticut Department of Emergency Management and Homeland Security to its emergency responder meetings, and representatives of that agency have met with Iroquois to discuss these issues.

**Iroquois Gas Transmission System L.P.  
Petition No. 815  
Responsible Witnesses:  
Robert Perless / Brian Wolf**

**Connecticut Siting Council  
Late-Filed Exhibits  
September 12, 2007**

## **LATE-FILED EXHIBIT NO. 6**

### **Safeguards to Address Reliability and Safe Operation**

At the hearing of September 12, Iroquois was asked to expand on its response to interrogatory Q-CSC-8 concerning safeguards to address the reliability and safety of operation of the proposed equipment.

Iroquois designs its facilities to meet or exceed the standards contained in 49 CFR Part 192 and augments those standards with Iroquois' own design and operating procedures. Iroquois has implemented many design, operations, safety and security measures that exceed minimum safety standards.

For example, Iroquois utilizes high strength pipe with toughness that provides for greater puncture resistance and strength. Existing mainline valves have hydraulic operators which can be used to open and close the valve on site as well as from our gas control center. In addition, Iroquois' compressor stations currently have three modes of communication for remote operation from our Gas Control center. These modes of communication include a wide area network (WAN), satellite, and telephone. Iroquois' Gas Control Center has the ability to start and stop the station remotely as needed based upon demand. The Gas Control center is manned 24 hours per day, 365 days per year.

The compressor stations utilize both a unit control and station control system to ensure proper operation. These systems are designed such that if they detect an upset condition (such as vibration, gas, fire or heat), they will make the facility safe by shutting down if necessary and potentially depressurizing the piping in the station. The turbine itself will be located in a unit enclosure with gas, fire and heat detection equipment. The unit enclosure is further located in the compressor building, which will also have heat, fire and gas detection equipment. In addition, the unit enclosure will have a fire suppression system in the event of a detection of fire.

Each compressor station has a natural gas fired back up power generator sized appropriately to allow continued operation of the station during interruption of commercial power. Each station also has a security system to detect intrusion into the building and the ability to monitor the fence perimeter. In addition, security cameras are located throughout the station yard.

For further information concerning the reliability and safety features associated with the Iroquois' 08/09 Expansion Project facilities, please refer to Draft Resource Report 11, Reliability and Safety, dated July 2007.